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August 26, 2011

Delta Protection Commission
14215 River Road
PO Box 530
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Submitted via email to espcomments@pacific.edu

Subject: SRCSD Comments to July 21, 2011, Public Draft Economic Sustainability Plan for the Sacramento – San Joaquin Delta

Dear Chair Nottoli and Members of the Commission:

The Sacramento Regional County Sanitation District (SRCSD) appreciates the opportunity to provide comments on the Public Draft of the Economic Sustainability Plan for the Sacramento – San Joaquin Delta. SRCSD provides wastewater collection and treatment services for over 1.3 million residents and businesses in the greater Sacramento region. SRCSD operates its treatment system in compliance with its National Pollutant Discharge Elimination System (NPDES) permit, providing protection of the beneficial uses of the Sacramento River and the Sacramento-San Joaquin Delta. We take our environmental stewardship role in protecting the environment and the watershed seriously. We believe environmental stewardship is good business, a public trust responsibility, and a key to achieving sustainable outcomes.

We appreciate the level of effort that has been required to develop the Economic Sustainability Plan. The document is well organized and provides a considerable amount of information concerning the key issues associated with Delta economics. We offer the following comments related to the plan and ask that clarifications or corrections be made to improve its content regarding the following items:

Item 1

Chapter 5 Framework for Analysis, Section 2, page 76 states “*Both the November 2010 draft BDCP and a May 2011 revised operation documents state that existing D-1641 water quality standards will be met in the north and west Delta with the measuring point moved slightly upstream in the Sacramento River.*”

Comment: Clarify and cite the May 2011 operation document being referenced by title and clarify the statement being made related to meeting water quality standards in the north and west Delta. It is unclear which operation document is being referenced and what water quality standard is relevant in the context of this section of Chapter 5.

Item 2

Chapter 8, Section 4.1.1(1), page 170 states *“Further degradation, or conversely, improvement of the water quality in the San Joaquin River. This is a long-standing problem with no easy solution. Actions directed towards improvement may be forced by an upcoming ruling of the State Water Resources Control Board, but if this does not happen, other mechanisms might be required to move forward.”*

Comment: Please clarify what specific upcoming ruling by the State Water Resources Control Board is being referred to that will result in water quality improvements in the San Joaquin River. Also, what other mechanisms are inferred if this ruling doesn't occur or isn't successful?

Item 3

Chapter 8, Section 4.1.2, page 172 states *“Most Delta communities discharge treated wastewater directly into the rivers and sloughs of the Delta, contributing to environmental problems and reducing Delta water quality for human use.”*

Comment: Discharges of treated wastewater are typically regulated through National Pollutant Discharge Elimination System (NPDES) permits, generally issued by the Regional Water Board. The Regional Water Board is required to develop permit effluent limitations to ensure that NPDES discharges are protective of beneficial uses and do not cause or contribute to violations of adopted water quality standards. Wastewater treatment facilities actually provide a net environmental benefit by collecting and cleaning wastewater prior to discharging it to the environment.

Recently, SRCSD invested millions of dollars to connect the sewer systems of Courtland and Walnut Grove to SRCSD's regional wastewater treatment facility. Discharging treated wastewater does not necessarily cause environmental problems and does not necessarily reduce water quality for human use. SRCSD recommends the following rewording of the sentence:

*“~~Most~~ **Many** Delta communities discharge treated wastewater ~~directly~~ into the rivers and sloughs of the Delta. ~~contributing to environmental problems and reducing Delta water quality for human use.~~ Such discharges are regulated by the State and Regional Water Boards through National Pollutant Discharge Elimination System (NPDES) permits to provide protection of all designated beneficial uses in the Delta.”*

Item 4

Chapter 8, Section 4.1.2, page 172 states *“In recent years, the Central Valley Regional Water Quality Board has ordered virtually all Delta wastewater dischargers to significantly upgrade their plants to tertiary treatment. Some wastewater utilities are in the building process whereas others, including Sacramento the largest discharger, are in the planning stages after recent regulatory decisions by the Board. Although the costs vary between utilities, the upgrades will cost the typical household in the Delta counties \$200 or more per year when fully operational compared to secondary treatment. While*

the improvements are costly, they are expected to make significant improvements to Delta water quality which furthers the coequal goals of the Delta Plan, and benefits the resource-related agriculture and recreation industries within the primary zone. They represent a significant investment from Delta communities, and are an action item already in progress to support the coequal goals and enhance Delta recreation and agriculture.”

Comment: As noted in the introduction of this comment letter, SRCSD provides wastewater collection and treatment services for over 1.3 million residents and businesses in the greater Sacramento region. SRCSD operates its treatment system in compliance with its National Pollutant Discharge Elimination System (NPDES) permit, providing protection of beneficial uses of the Sacramento River and the Sacramento-San Joaquin Delta. SRCSD has a history of over 99.9% compliance with our NPDES permit and has spent in excess of \$20 million over the past decade on a wide range of environmentally-focused efforts that include Delta monitoring, modeling, research, public education, and pollution prevention efforts that are protective of our watershed. Many other dischargers to the Delta and its tributaries also provide a current net environmental benefit by collecting and treating urban and rural, point source and non-point source waste and runoff waters that originate from the communities and areas they serve.

SRCSD has recently been issued a new wastewater discharge permit that requires upgrading its facilities to provide advanced treatment including nitrification, de-nitrification, and filtration. The estimated construction cost for this upgrade is over \$2 billion dollars, which will require significant rate increases over the next 10 years for existing homeowners, businesses, and industries that are served by SRCSD. While SRCSD is the largest wastewater discharger to the Sacramento-San Joaquin Delta, it represents only a small fractional component of the total Delta flow. A recent report produced by Systech Water Resources, Inc. for the Central Valley Drinking Water Policy Workgroup (Drinking Water Workgroup) states that point source discharges combined account for approximately only 1% of the average source water flow for the Sacramento River at Morrison Creek, just downstream of the Sacramento Regional Wastewater Treatment Plant. Note that while the efforts of the Drinking Water Workgroup have not yet been completed, the reports generated from this workgroup agree with numerous other similar technical and modeling reports that indicate that total flows and constituent loads from wastewater treatment facilities that discharge to the Delta represent a small fraction of the Delta's total flows and loading. ⁽¹⁾

The inferred relationship between wastewater utility upgrades and benefits or enhancements related to Delta agricultural or recreational uses within the primary zone is inaccurate. It is also unlikely that future planned wastewater treatment plant upgrades will result in significant improvements to Delta water quality that will impact the Delta communities economically.

(1) Central Valley Drinking Water Policy Work Group.
Website www.swrcb.ca.gov/rwqcb5/water_issues/drinking_water_policy

Chair Don Nottoli
Delta Protection Commission
August 26, 2011
Page 4

SRCSO suggests the following corrections to this item:

"In recent years, the Central Valley Regional Water Quality Board has ordered virtually all Delta wastewater dischargers to significantly upgrade their plants to advanced treatment. Some wastewater utilities are in the process of constructing new facilities, whereas others, including the Sacramento Regional County Sanitation District facility, the largest wastewater treatment facility discharging to the Delta, are in the planning stages after recent regulatory decisions by the Central Valley Regional Water Board. Although the costs vary between utilities, the costs for upgrades to advanced treatment ~~will cost the typical household in the Delta counties \$200 or more per year~~ are significant compared to secondary treatment. ~~While the~~ These treatment improvements ~~are costly, they are expected to~~ may make ~~significant~~ some improvements to Delta water quality. ~~which furthers the coequal goals of the Delta Plan, and benefits the resource-related agriculture and recreation industries within the primary zone. They~~ This effort represents a significant investment from ~~Delta~~ communities in and surrounding the Delta, and ~~are~~ is an action item already in progress that supports the coequal goals. ~~and enhance Delta recreation and agriculture."~~

We appreciate your consideration of our comments and welcome any questions. Please feel free to contact me directly at 916-876-6092 or mitchellts@sacsewer.com or Lysa Voight at 916-876-6038 or voightls@sacsewer.com.

Sincerely,



Terrie Mitchell
Manager, Legislative and Regulatory Affairs

cc: Stan Dean, District Engineer
Prabhakar Somavarapu, Director of Policy and Planning